

START

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ATTACHMENT 1

Change Number M-17-95-02	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 3/9/95
Originator S. D. Godfrey	Phone (509) 372-0501	
Class of Change <input checked="" type="checkbox"/> I - Signatories	<input type="checkbox"/> II - Project Manager	<input type="checkbox"/> III - Unit Manager
Change Title	Revise M-17-00A to Allow for Temporary Storage Pending Implementation of BAT/AKART	
Description/Justification of Change	Revise Major Milestone M-17-00A. (Continued on next page)	
Impact of Change	Milestone M-17-00A is revised by this change to allow temporary storage of 242-A Evaporator Process Condensate prior to implementation of Best Available Technology and All Known, Available, and Reasonable methods of prevention, control, and Treatment (BAT/AKART) and will be met without impact to the scheduled completion date. The 242-A Evaporator has space in the LERF to operate through at least June of 1996. As a result, there are no foreseeable impacts to the environment or to other TPA commitments due to this change.	
Affected Documents	Hanford Federal Facility Agreement and Consent Order, Fourth Amendment, January 1994, Appendix D (Table D, pages D-23 and D-24).	
Approvals		
<u><i>Sam L. Beckwith</i></u> DOE	<u>3/13/95</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
<u><i>Chad Clarke</i></u> EPA	<u>3/24/95</u> Date	<input type="checkbox"/> Approved <input checked="" type="checkbox"/> Disapproved
<u><i>Mary R. Willard</i></u> Ecology	<u>3/20/95</u> Date	<input type="checkbox"/> Approved <input checked="" type="checkbox"/> Disapproved

Description/Justification of Change (continued)

The revised milestone is as follows:

M-17-00A Complete Liquid Effluent Treatment Facilities/Upgrades 6/30/1995
for All Phase I Streams.

Hanford currently has 19 Phase I liquid effluent streams being discharged to cribs, ponds, or ditches. Phase I streams are defined in the "Annual Status Report of the Plan and Schedule to Discontinue Disposal of Contaminated Liquids into the Soil Column at the Hanford Site," September 1988. Some of the cribs, ponds, or ditches are RCRA waste disposal units. These, along with others, are located in areas requiring inactive site investigations/remedial actions. Liquid effluent streams are classified as Phase I streams based upon radionuclide/chemical content, regulatory requirements relative to the waste disposal unit, chemical spill potential, and waste disposal unit life expectancy. Each of the Phase I effluent streams shall be either treated, or eliminated, as defined in the above referenced report or stored pending implementation of BAT/AKART. ~~BAT/AKART for stored streams shall be implemented no later than March 31, 1996.~~ Interim milestones for Phase I streams include the development and implementation of an impact assessment methodology, sampling and analysis plans, treatment system design and construction commitments, interim flow restrictions and dates for ceasing discharge. ~~Specific interim/target milestone dates for each stream and any associated treatment or disposal facilities are included in Appendix D work schedules.~~

The 200 Area Effluent Treatment Facility (ETF) is currently under construction. An initial architect/engineering firm design-construction schedule for the 200 Area ETF was submitted to EPA and Ecology by RL on February 28, 1992 (M-17-14A), which identified a project completion date of October 5, 1994. Subsequently, TPA change M-17-93-07 extended the date for full scale hot startup (M-17-14) and implementation of BAT/AKART (M-17-29) from October 31, 1994, to June 30, 1995.

The construction contractor notified WHC/RL of a delay in construction completion from September 7, 1994, until November/December 1994 due to problems with several plant systems (primarily the computer control system). Based upon remaining work scope and past contractor performance, an actual construction completion closer to the March/April 1995 time frame is projected. Delays in construction completion past October 1, 1994, are impacting the baseline operational readiness and startup schedule, resulting in a day-for-day slip in the associated TPA milestones (M-17-14 and M-17-29). Approximately 9 months of startup preparations are required by WHC prior to initiating plant operations. This consists of about 6 months of testing, training, and procedure activities, and about 3 months of readiness review activities.

Major milestone M-17-00A has 126 associated interim milestones of which 108 have been completed either on time or ahead of time. Included with this milestone are 22 waste water streams (19 Phase I streams and 3 Phase II streams) from 15 different facilities, with all streams on schedule to meet

TPA milestones except the 242-A Evaporator Process Condensate. TPA milestones M-17-14 and M-17-29 cover hot startup of the 200 Area ETF and implementation of BAT/AKART for the process condensate stream, respectively. Both milestones are associated with the treatment of the process condensate stream to allow the 242-A Evaporator to continue operating.

After several meetings and information briefings, the parties have agreed to revise descriptive wording of milestone M-17-00A to allow for successful completion not only by treatment or elimination of Phase I streams, but also by storage of the streams until BAT/AKART implementation. This change meets the original intent of the milestone and of the congressional mandate to cease discharges of untreated liquid effluents to the soil column.

With the expected delay in startup of the 200 Area ETF, the 242-A Evaporator continues to operate with the process condensate stream being stored in the Liquid Effluent Retention Facility (LERF). The LERF has capacity to store this waste water until at least June 1996 based on the current 242-A Evaporator operating schedule.

TPA milestones M-17-14 and M-17-29 are unchanged by this change request.